

**REGER | RIZZO | DARNALL** LLP

Attorneys at Law

Michael J. Needleman  
Partner  
mneedleman@regerlaw.com

700 East Gate Drive  
Suite 101  
Mt. Laurel, NJ 08054

Main: 856.778.8950  
Direct: 215.495.6513  
Fax: 215.495.6600

November 26, 2024

**VIA: E-FILING**

Honorable Matthew J. Skahill, USMJ  
United States District Court of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets  
Camden, NJ 08101

**Re: Manuel Pontes v. Rowan University  
In the United States District Court District of New Jersey  
Case No.: 18-CV-17317**

Dear Judge Skahill:

Please recall I represent Plaintiff in connection with this matter. Please be advised that the deposition of Nancy Pontes took place, as ordered, on November 25, 2024.

She testified about several aspects of this case, including Plaintiff's deposition, which began in January 2023 and was completed in August 2023, due to his medical condition, which also supported this Court's entry of a Stay of Litigation for 120 days.

Given that Defendant's Request for Sanctions in connection with Plaintiff's illness and inability to complete his deposition until August 2023 is still outstanding, Plaintiff respectfully requests, this Court deny Defendant's Motion for Sanctions. At the Court's preference, the undersigned would be happy to arrange either a telephone conference or appear in person.

The Court's time and consideration are greatly appreciated. If I can be of any additional assistance, please do not hesitate to have chambers contact my office.

Respectfully submitted,

Reger Rizzo & Darnall LLP

*Michael J. Needleman /s/*

Michael J. Needleman, Esquire

MJN/jab  
Ec: Michael J. Miles, Esquire  
Professor Manuel Pontes